

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

CR. NO.: 11-280 (16) (MJD/JSM)

Plaintiff,

v.

**MOTION TO SUPPRESS
EVIDENCE OBTAINED FROM
ELECTRONIC SURVEILLANCE
AND WIRETAPPING**

ERIKA ROMERO MONTENEGRO,

Defendant.

Defendant, Erika R. Montenegro, by and through her attorney, pursuant to her Fourth Amendment protections and the Sixth Amendment, respectfully moves to suppress the evidence the Government has obtained from its wire tap as it relates to her communications. Defendant provides:

1. Because Defendant's voice appears on the tapes, she has concurrent standing.
2. The government has failed to demonstrate the necessary necessity to justify the wire taps.

Respectfully submitted,

PETER B. WOLD, P.A.

Dated: October 11, 2011.

s/ Peter B. Wold
Peter B. Wold, ID #118382
247 Third Avenue South
Minneapolis, MN 55415
Telephone: 612.341.2525
Facsimile: 612.341.0116